



August 25, 2005

VIA ELECTRONIC FILING

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

**Re: E911 Requirements for IP-Enabled Service Providers; WC Docket No. 05-196
Lingo, Inc. and Primus Telecommunications, Inc. *Ex Parte* Filing**

Dear Ms. Dortch:

On August 24, 2005, Messrs. Charles Schwantes, John Butler, and Walter Stone of Lingo, Inc. and Primus Telecommunications, Inc. met with Ms. Elizabeth Yockus Mumaw and Mr. Mark Stone of the FCC to discuss the E911 requirements for IP-Enabled Service Providers. The items discussed are presented below.

- 1) Feasibility of compliance with E911 requirements in all parts of the United States by November 28, 2005.
- 2) Applicability of E911 Requirements when a customer:
 - a) moves temporarily (*e.g.*, during a vacation) to areas where E911 is not available;
 - b) moves frequently (*e.g.*, a consultant who is in a different national or international city each week); or
 - c) resides outside the United States (a substantial percentage of Lingo's calls originate outside of the United States).
- 3) Issues associated with collecting 911 advisory acknowledgements from less than 100% of customers:
 - a) terminating or suspending customers that have not provided acknowledgement is not desirable because
 - i) Customers may be left with no service at all; and
 - ii) Porting slug created by a large number of simultaneous disconnects would be difficult/impossible for industry to handle well
 - b) applicability of requirement to collect acknowledgements from customers residing abroad.

Please direct any questions regarding this matter to the undersigned.

Sincerely,

A handwritten signature in blue ink, appearing to read "WLS".

Walter L. Stone
Lingo, Inc. and
Primus Telecommunications, Inc.

cc: Elizabeth Yockus Mumaw, FCC
Mark Stone, FCC